

Remarks

This Application has been carefully reviewed in light of the Final Office Action dated June 5, 2007 ("Office Action"). Claims 1-18 and 20 are pending and stand rejected. Although applicants believe the claims are allowable without amendment, Claims 1, 4-5, 9, and 12-17 have been amended to expedite issuance of a patent from this application. Applicants respectfully submit that no new matter has been added to the amended claims. Applicants respectfully request reconsideration and allowance of all pending claims.

I. The Claims are Allowable Over the Proposed *Khan-Arcuri* Combination

The Examiner rejects Claims 1-18 and 20 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2002/0018078 A1 to Khan et al. ("*Khan*") and U.S. Patent No. 6,792,475 B1 to Arcuri et al. ("*Arcuri*"). Applicants respectfully disagree.

**The Proposed *Khan-Arcuri* Combination Fails to Disclose, Teach, or Suggest
Various Limitations Recited in Independent Claims 1, 9, and 14-17.**

For example, the proposed *Khan-Arcuri* combination fails to disclose, teach, or suggest:

- analyzing an identified web page to determine a list of HTML tags, each HTML tag corresponding to a particular portion of the content of the identified web page; and
- presenting the determined list of HTML tags to a user in a navigation pane, the navigation pane presenting the determined list of HTML tags in the form of a tree structure that provides a visual representation of relationships between the HTML tags corresponding to particular portions of the content of the identified web page, the navigation pane operable to allow the user to view and select one or more of the HTML tags corresponding to particular portions of the content of the identified web page from the determined list of HTML tags,

as recited in independent Claim 1.

Khan discloses a process for generating a customizable network user interface. (Page 5, Paragraph 73). However, as acknowledged by the Examiner, *Khan* fails to disclose "analyzing the web page" (Office Action, Page 3). *Khan* also fails to disclose "determining a list of HTML tags, each HTML tag corresponding to a particular portion of the content of the

identified web page,” as recited in independent Claim 1. Accordingly, *Khan* also fails to disclose “presenting the determined list of HTML tags to a user in a navigation pane,” as recited in independent Claim 1, as amended.

Applicants respectfully submit that the proposed combination of *Arcuri* with *Khan* fails to overcome the inadequacies of *Khan*. According to the Examiner, *Arcuri* discloses “a navigation pane . . . that allows the user to select a web element from the navigation pane.” (Office Action, Page 4). However, *Arcuri* discloses that the Navigation pane includes HTML files. (Column 8, Lines 46-58). An example HTML file described in *Arcuri* is a “Home Page.” (Column 7, Line 60). According to *Arcuri*, the Home Page HTML file may be a “parent” page that has numerous “child” pages. (Column 8, Lines 6-23). This relationship is illustrated in Figure 8. However, even if *Arcuri* could properly be construed as disclosing presenting a list of HTML files to a user in a navigation pane, the HTML files disclosed in *Arcuri* could not be properly construed as HTML tags. Thus, the proposed *Khan-Arcuri* combination fails to disclose, teach, or suggest each and every element recited in independent Claim 1. Claim 1 is allowable for at least these reasons.

Independent Claims 9 and 14-17 are also allowable for at least these reasons. Dependent Claims 2-8, 10-13, 18, and 20 depend from independent Claims 1 and 9, shown above to be allowable. For at least this reason, dependent Claims 2-8, 10-13, 18, and 20 are also allowable. For at least these reasons, Applicants respectfully request reconsideration and allowance of all pending claims.

II. No Waiver

All of Applicants’ arguments and amendments are without prejudice and disclaimer. Additionally, Applicants have merely discussed example reasons for allowability sufficient to overcome the Examiner’s rejections. Applicants reserve the right to discuss additional reasons for allowance, such as additional distinctions over the references cited, the improper combination of the cited references, or the improper use of one or more references as prior art, in a later Response or on Appeal, if appropriate. By not responding to additional statements made by the Examiner, Applicants do not acquiesce to the Examiner’s additional statements.

Conclusion

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending claims.

If the Examiner believes that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Russell J. Crain, Attorney for Applicants, at the Examiner's convenience at (214) 953-6803.

Filing concurrently herewith is a Request for Continued Examination (RCE) Transmittal. Although Applicants believe no additional fee is due, the Commissioner is hereby authorized to charge any fee or credit any overpayment to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

Respectfully submitted,

BAKER BOTTS L.L.P.
Attorneys for Applicants



Russell J. Crain
Reg. No. 60,657

Date: 9/5, 2007

CORRESPONDENCE ADDRESS:

Customer No.

05073